

SUBSTANTIAL CONFORMANCE REVIEW CHECKLIST**MASTER STORM WATER SYSTEM MAINTENANCE PROGRAM**

Purpose: This Substantial Conformance Review (SCR) Checklist is intended to be used by Development Services Department Staff as an aid in reviewing storm water system maintenance projects for consistency with the Site Development Permit (SDP) based on conformance with the Mitigation, Monitoring and Reporting Program (MMRP); the Master Maintenance Protocols contained in the Master Program; and the SDP Conditions.

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ACTIVITY INFORMATION

Master Program Map #s): 101

City Equipment #(s): 88000261 & 88000262

Creek Name: South Chollas Creek Channel

Watershed(s): Pueblo San Diego

Location: Map 101 of the South Chollas Creek Channel is located in the Emerald Hills Community, east of Interstate 805, south of State Route 94, and west of State Route 125.

DOCUMENTS INCLUDED IN CONSISTENCY DETERMINATION PACKAGE**Included NA Document**

- | | | |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Individual Maintenance Plan (IMP) – Appendix A |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Individual Biological Assessment (IBA) – Appendix B |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Individual Historical Assessment (IHA) – Appendix C |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Individual Hydrologic and Hydraulic Assessment (IHHA) – Appendix D |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Individual Water Quality Assessment (IWQA) – Appendix E |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Individual Noise Assessment (INA) – Appendix F |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Water Pollution Control Plan (WPCP) – Appendix G |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Habitat Mitigation and Monitoring Plan (HMMP) – Appendix H |

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
Master Program PEIR Mitigation, Monitoring, and Reporting Program			
General Mitigation			
1	Have mitigation measures for impacts to biological resources, historical resources, land use, and paleontological resources, as appropriate, been included in entirety on the submitted maintenance documents and contract specifications, under the heading, “Environmental Mitigation Requirements”? (General Mitigation Measure 1)	Y	<p>Mitigation measures are included in the following SCR Appendices:</p> <ul style="list-style-type: none"> • Individual Maintenance Plans (IMP) - see Appendix A • Individual Biological Assessment (IBA) - see Appendix B • Individual Historic Assessment (IHA) – see Appendix E • Water Pollution Control Plan (WPCP) – see Appendix H <p>Mitigation related to paleontological resources is not required. No activity-specific mitigation measures are required for land use.</p>
2	Is a Pre-maintenance Meeting required, including, as appropriate, the Mitigation Monitoring Coordinator (MMC), Storm Water Division (SWD) Project Manager, Biological Monitor, Historical Monitor, Paleontological Monitor, and Maintenance Contractor (MC), and other parties of interest? (General Mitigation Measure 2)	Y	<p>As required by Note 3 under Master Storm Water System Maintenance Program (MMP) Protocol Requirements (Sheet 4 of the IMP for Map 101), pre-maintenance meetings will be scheduled in coordination with MMC prior to initiating project activities. A qualified biologist, field engineer, planner, equipment operators, and other key personnel will be required and included in the pre-maintenance meeting. In addition, in accordance with PEIR Mitigation Measure 4.4.3, a qualified archaeologist and Native American monitor will attend the pre-maintenance meeting. Since anticipated maintenance, access, and staging areas would occur within the preexisting channels or paved areas and would not lower the channels below their original depth, the likelihood to discover paleontological resources is considered low. Consequently, a paleontological monitor is not required.</p>
3	Is there documented evidence of compliance with other permitting authorities (e.g., copies of permits issued, letters of resolution issued by the Responsible Agency documenting compliance, or other evidence documenting compliance and deemed acceptable by the Assistant Deputy Director [ADD] Environmental Designee), as applicable? (General Mitigation Measure 3)	Pending	<p>For this project, the following permits and other approvals are pending:</p> <ul style="list-style-type: none"> • Substantial Conformance Review for City of San Diego Master Site Development Permit No. 1134892 • Regional Water Quality Control Board (RWQCB) 401 Water Quality Certification • Army Corps of Engineers (ACOE) 404 Nationwide Permit • California Dept. of Fish and Wildlife (CDFW) 1600 Streambed Alteration Agreement (1602)

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Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
General Mitigation (cont.)			
4	Is there documented evidence of compliance with Section 1602 of the State of California Fish & Game Code (e.g., copies of permits issued, letters of resolution issued by the Responsible Agency documenting compliance, or other evidence documenting compliance and deemed acceptable by the ADD Environmental Designee), as applicable? (General Mitigation Measure 4)	Pending	As indicated in response to No. 3, an application for authorization under Section 1602 of the Fish and Game Code is pending.
Biological Resources			
5	Has a qualified biologist prepared an IBA for each area proposed to be maintained in accordance with the specifications included in the Master Program? (Mitigation Measure 4.3.1)	Y	The IBA (Appendix B) was prepared by HELIX biologists meeting the qualifications specified in the City of San Diego Guidelines for Conducting Biology Surveys (June 2012 revision), and covers the area proposed to be maintained in accordance with the specifications in the MMP.
6	Have the IMPs and IBAs for maintenance activities within a proposed annual maintenance program been approved by the City's Assistant Deputy Director (ADD) Environmental Designee and state and federal agencies with jurisdiction over maintenance activities? (Mitigation Measure 4.3.2)	TBD	<i>Note: Requires further City review of the IMP and IBA to satisfy this requirement prior to initiation of any proposed annual maintenance activity.</i>
7	Has an IBA been prepared by a qualified biologist for each proposed maintenance activity, including the required contents? (Mitigation Measure 4.3.3)	Y	See response to No. 5.
8	Has a mitigation account been established to provide sufficient funds to implement all biological mitigation associated with the proposed maintenance act? (Mitigation Measure 4.3.4)	Y	The mitigation efforts associated with this project will be funded by the T&SWD's annual budget. A Departmental Internal Order (I/O) number/account has been set up to track mitigation costs to allocate appropriate funding to implement associated biological mitigation projects.
9	Has evidence been provided documenting approval of the proposed maintenance by permitting authorities? (Mitigation Measure 4.3.5)	Pending	T&SWD will provide final authorization to comply with permitting authorities prior to final approval.
10	Does the IMP call for a pre-maintenance meeting, if identified in the associated IBA? (Mitigation Measure 4.3.6)	Y	See response to No. 2.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Biological Resources (cont.)			
11	Does the IBA for each proposed maintenance activity identify appropriate wetland mitigation measures according to the ratios identified in Table 4.3-10? (Mitigation Measure 4.3.9)	Y	<p>Impacts to USACE, RWQCB, and CDFW jurisdictional earthen-bottom channel from maintenance will amount to 0.04 acre. Mitigation is proposed at a 2:1 ratio for wetland impacts, resulting in a total mitigation requirement of 0.08 acre.</p> <p>The proposed maintenance will impact 0.04 acre of City wetland habitat, consisting of southern riparian forest. Proposed mitigation, in accordance with the PEIR mitigation ratios identified in Table 4.3.10, would be 0.12 acres for southern riparian forest (3:1 ratio, composed of 1:1 restoration or creation and 2:1 acquisition and/or enhancement).</p>
12	Have wetland mitigation plans and enhancement and/or restoration plans been prepared and submitted to the DSD pursuant to the requirements described in Mitigation Measure 4.3.10? Are they consistent with Appendix H of the Biological Technical Report (BTR) contained in Appendix D.3 of the PEIR? (Mitigation Measure 4.3.10)	Y	Mitigation for wetland impacts from maintenance in Map 101 is proposed at the Stadium Mitigation Site in the City of San Diego. The location of the mitigation site is shown on Figure 7. The 0.04 acre of southern riparian forest mitigation would be fulfilled through the acquisition of 0.04 acre of restoration (rehabilitation) and 0.08 acre of enhancement of riparian woodland.
13	Would upland impacts be compensated through payment into the City's Habitat Acquisition Fund, or through acquisition and/or preservation of land in accordance with the ratios and requirements identified in Table 4.3-11? (Mitigation Measure 4.3.11)	Y	As identified in the IBA (Appendix B), impacts to sensitive uplands (Diegan coastal sage scrub) would require a total of 0.04 acre of mitigation. The mitigation will occur through payment into the City's Habitat Acquisition Fund or Cornerstone Lands.
14	If the maintenance activity would result in loss of habitat for the coastal California gnatcatcher, is mitigation planned (i.e., through the acquisition of suitable habitat or mitigation credits within the MHPA at a ratio of 1:1, to be accomplished within six months of the date of maintenance completion? (Mitigation Measure 4.3.12)	Y	Although the coastal California gnatcatcher (CAGNs) has been historically reported within the Multi-Planning Habitat Area (MHPA) approximately 500 feet southwest of the Map 101 channel, the maintenance area contains a small amount (0.04 acre) of suitable habitat. Mitigation for impacts to Diegan coastal sage scrub will occur at a 1:1 ratio through payment into the City's Habitat Acquisition Fund or Cornerstone Lands, which is considered suitable habitat to mitigate for impacts to coastal California gnatcatcher.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Biological Resources (cont.)			
15	<p>If sensitive biological resources may be impacted, would the monitoring biologist be able to verify that the following actions have been taken:</p> <ul style="list-style-type: none"> • Has fencing, flagging, signage, or other means to protect sensitive resources been implemented? • Are noise attenuation measures needed to protect sensitive wildlife in place and effective? • Have nesting raptors been identified and necessary maintenance setbacks have been established if maintenance is to occur between February 1 and August 1? <p>(Mitigation Measure 4.3.13)</p>	Y	Pursuant to the mitigation measures included in the IBA (Appendix B, pages 10 through 12), pre-maintenance surveys would be conducted if maintenance activities occur during the breeding season of raptors and other birds protected by the Migratory Bird Treaty Act. If active nests are found, setbacks identified in the IBA would be respected as long as the nests are active. As described in the IBA and INA (Appendix F), construction noise would not exceed the allowed levels for coastal California gnatcatcher in the MHPA and noise attenuation measures would not be needed.
16	Have off-site mitigation areas been reviewed to determine if the mitigation would have a significant impact on biological resources located within the disturbance area of the mitigation? If so, have appropriate mitigation measures been proposed to reduce these impacts to below a level of significance? (Mitigation Measures 4.3.14)	NA	Mitigation for wetland impacts from maintenance in Map 101 is proposed at the Stadium Mitigation Site in the City of San Diego. The location of the mitigation site is shown on Figure 7. The 0.04 acre of southern riparian forest mitigation would be fulfilled through the acquisition of 0.04 acre of restoration (rehabilitation) and 0.08 acre of enhancement of riparian woodland.
17	Does the IBA discuss appropriate actions to offset impacts to listed or endemic sensitive plant species? (Mitigation Measure 4.3.15)	NA	No endemic sensitive plants species would be impacted by maintenance (See Appendix B).
18	Would maintenance activities meet setback requirements for sensitive species? (Mitigation Measure 4.3.16)	Y	If maintenance is planned during the raptor nesting season, pre-maintenance surveys would be conducted, and maintenance setback buffers established around active nests in accordance with the mitigation included in the IBA.
19	Would clearing, grubbing, or grading (inside and outside the MHPA) be restricted during the breeding season of the listed species? Have protocol surveys been conducted for other potentially occurring sensitive species? If observed, have adequate mitigation measures been identified in the IBA? (Mitigation Measure 4.3.17)	Y	The potential exists for impacts to nesting raptors and coastal California gnatcatcher if maintenance is conducted during their respective breeding seasons (as described in Appendix B). Pages 11 and 12 of the IBA include mitigation measures to avoid impacts to these birds. In addition, Notes 5 and 7 under MMP Protocol Requirements and Note 3 under Additional Maintenance Requirement on Sheet 4 of the IMP for Map 101 includes measures to avoid impacts to sensitive birds. Protocol surveys for least Bell's vireo were conducted in 2017 and none were detected.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Biological Resources (cont.)			
20	Has evidence been submitted to document that protocol surveys have been conducted for potentially occurring sensitive bird species? (Mitigation Measure 4.3.18)	Y	As described in Appendix B, protocol surveys for the least Bell's vireo were conducted. The results of this survey are summarized in a letter from HELIX to the USFWS, dated August 10, 2017. The survey did not find evidence of least Bell's vireo and concluded that the isolated patches of southern riparian forest and disturbed southern willow scrub in and near the maintenance area are marginally suitable for the species. Due to previous sighting and adjacent habitat, the coastal California gnatcatcher is assumed present.
21	Has the IBA included appropriate mitigation measures when the potential exists for a sensitive bird species to occur near a proposed maintenance area and no protocol surveys have been conducted? (Mitigation Measures 4.3.19, 20 and 21)	Y	See response to No. 19 for mitigation measures for sensitive bird species.
22	Would removal of any eucalyptus trees or other trees used by raptors for nesting be proposed within the maintenance area? If yes, would maintenance include appropriate setbacks and limitations? (Mitigation Measure 4.3.22)	Y	Southern riparian forest at the western portion of the maintenance area could be used by raptors for nesting. As mentioned in the response to No. 19, Page 11 and 12 of the IBA include mitigation measures to avoid impacts to these birds. In addition, Notes 5 and 7 under MMP Protocol Requirements and Note 3 under Additional Maintenance Requirement on Sheet 4 of the IMP includes measures to avoid impacts to sensitive birds, including raptors.
23	Would maintenance activities occur at known localities for listed fish species? If yes, would maintenance include appropriate mitigation? (Mitigation Measure 4.3.23)	NA	There are no known listed fish species occurring within the project area.
24	Would maintenance activities occur within areas supporting listed and/or narrow endemic plants? If yes, would maintenance proceed as described in Mitigation Measure 4.3.24?	N	Listed/narrow endemic plants are not present in segments proposed for maintenance.
25	If maintenance is proposed during the nesting season of avian species, including those species not covered by the MSCP, does the IBA require maintenance within or adjacent to avian nesting habitat occur outside of the avian breeding season (January 15 to August 31) unless postponing maintenance would result in a threat to human life or property? (Mitigation Measure 4.3.25)	Y	The IBA and IMP require specific measures to protect sensitive wildlife from adverse impacts related to maintenance including setbacks from active nests (see Notes 5 and 7 under MMP Protocol Requirements and Note 3 under Additional Maintenance Requirement on Sheet 4 of the IMP for Map 101, and pages 11 and 12 of Appendix B). If maintenance is conducted during the nesting season, these measures would be followed.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Historical Resources			
26	Has a qualified archaeologist determined the potential for significant historical resources to occur in the maintenance area and prepared an IHA? (Mitigation Measure 4.4.1)	Y	A qualified archaeologist has prepared an IHA (Appendix C) to document resource potential in the maintenance area. The IHA determined that the staging and maintenance areas are located within close proximity to known archaeological sites, and therefore there is a moderate cultural sensitivity as intact archaeological deposits could be impacted within the staging areas and other areas adjacent to the channel or beneath the channel bottom.
27	Has an Individual Historical Assessment (IHA) been prepared for the proposed maintenance? (Mitigation Measure 4.4.1)	Y	An IHA has been prepared in compliance with the City of San Diego Historical Resources Guidelines and MMP (see Appendix C). As stated on page 4 of the IHA, no cultural resources were identified within the maintenance area. However, there is a moderate cultural sensitivity as intact archaeological deposits could be impacted within the staging areas and other areas adjacent to the channel or beneath the channel bottom. Page 4 of the IHA list mitigation measures to be implemented to minimize or avoid impacts to historical resources.
28	If required, has a field survey of the maintenance activity APE been performed by a qualified archaeologist and a Native American monitor? (Mitigation Measure 4.4.1)	Y	A field survey was conducted by a qualified archaeologist and a Native American monitor on April 6, 2017 (see page 4 of Appendix C).
29	Has a record search been requested from the South Coastal Information Center (SCIC)? (Mitigation Measure 4.4.1)	Y	A full records search was conducted from the SCIC in March 2017 for the channel. See Appendix C.
30	Has an archaeological testing program been performed based on the City's Historical Resources Guidelines? (Mitigation Measure 4.4.1)	NA	As stated on page 4 of the IHA, no cultural resources were identified within the maintenance area. Since MM 4.4.1 states 'the archaeologist shall conduct an archaeological testing program for any identified historical resources,' and since no historic resources have been identified, testing is not required.
31	Have significant historical resources been identified within the proposed maintenance activity APE? If yes, address criteria numbers 32 through 38. If no, proceed to criteria number 39 (Mitigation Measures 4.4.1 and 4.4.2)	N	There are no known significant resources within the APE.
32	Has a Principal Investigator (PI) been selected and approved by the SWD and ADD Environmental Designee? (Mitigation Measure 4.4.2.1)	NA	NA
33	Have mitigation recommendations from the IHA been incorporated into the IMP to the satisfaction of the PI and the ADD Environmental Designee? (Mitigation Measure 4.4.2.2)	NA	NA

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Historical Resources (cont.)			
34	If impacts to significant historical resources cannot be avoided, has the PI prepared and implemented an Archaeological Research Design and Data Recovery Program (ARDDRP) for the affected resources, with input from a Native American consultant (approved by the ADD Environmental Designee)? (Mitigation Measure 4.4.2.3)	NA	NA
35	Has a pre-maintenance meeting been planned and/or conducted on site, including representatives from the PI, Native American consultant, SWD, MMC, Resident Engineer (RE), and MC? (Mitigation Measure 4.4.2.4)	NA	NA
36	If human remains have been discovered in the course of conducting the ARDDRP, would the procedures set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) be implemented? (Mitigation Measure 4.4.2.5)	NA	NA
37	Will the PI and Archaeologist assume required responsibilities? (Mitigation Measures 4.4.2.6, 4.4.2.7, and 4.4.2.8)	NA	NA
38	If the IHA identifies a moderate to high potential for the occurrence of significant historical resources within the APE, would mitigation measures be implemented? (Mitigation Measure 4.4.3)	Y	The cultural resources sensitivity for the channel is identified as “moderate” in the IHA because the staging and maintenance areas are located within close proximity to known archaeological sites, and therefore there is a moderate possibility that intact archaeological deposits could be impacted within the staging areas and other areas adjacent to the channel or beneath the channel bottom. Mitigation measures, including monitoring, would be implemented and are described on pages 4 and 5 of the IHA (Appendix C).
Land Use			
39	Has the ADD Environmental Designee verified that all MHPA boundaries and limits of work have been delineated on all maintenance documents? (Mitigation Measure 4.1.1)	NA	The MHPA is located approximately 500 feet southwest of the maintenance area for Map 101 (Figure 5 of Appendix B). Access to the maintenance area would occur through developed lots. In addition, existing commercial buildings and Federal Boulevard exist between the channel and the MHPA. Given the distance between the channel and MHPA, the maintenance area is not expected to impact the MHPA and the MHPA boundary is not included on the IMP sheets.

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Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Land Use (cont.)			
40	Has a qualified biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) recovery permit) surveyed habitat areas inside and outside the MHPA suspected to serve as habitat for the coastal California gnatcatcher, least Bell's vireo and/or other listed species? (Mitigation Measure 4.1.2)	Y	<p>The coastal California gnatcatcher has been historically reported within the MHPA approximately 500 feet southwest of the Map 101 channel as recently as 2015. The maintenance area supports a small area (0.04 acre) of suitable habitat for the coastal California gnatcatcher</p> <p>Rather than conducting focused surveys for the coastal California gnatcatcher, the species is assumed present and the IBA included measures to restrict the clearing of coastal sage scrub habitat during the gnatcatcher breeding season, which is defined as March 1 through August 15.</p> <p>Map 101 was determined to be marginal habitat for the least Bell's vireo as part of the initial habitat assessment for that species. Focused surveys for least Bell's vireo were conducted in 2017 to confirm that the species was not present, and no vireos were documented during the 2017 surveys.</p>
41	Has a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) performed a noise analysis for the proposed maintenance activity? (Mitigation Measure 4.1.3)	Y	According to Mitigation Measure 4.1.3, a noise analysis is required if a listed species is located within 500 feet of a proposed maintenance activity. As identified in Appendix B, the coastal California gnatcatcher is assumed present due to adjacent habitat and previous sightings in the area. Therefore, an INA was prepared (Appendix F).
42	Would the proposed maintenance have the potential to impact breeding activities of listed species? If yes, would maintenance activities be restricted to outside the breeding season? (Mitigation Measure 4.1.4)	Y	The IBA concludes that maintenance activities could impact coastal California gnatcatcher, nesting raptors and other MBTA birds. As indicated in response to No. 19, mitigation measures would be implemented during the breeding season to protect sensitive birds from significant impacts.
43	If maintenance cannot be avoided during an identified breeding season for a listed bird which is determined to be potentially significantly affected by maintenance, would the appropriate measures be taken? (Mitigation Measure 4.1.5)	Y	As indicated in response to No. 20, coastal California gnatcatcher have the potential to occur in the maintenance area. Specific breeding bird mitigation measures listed on pages 11 and 12 of the IBA (Appendix B) would be implemented if work is proposed during the breeding season to ensure that appropriate measures are taken.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Land Use (cont.)			
44	Has a pre-maintenance meeting been planned and/or conducted, including the MC, Project Biologist, and City representative? (Mitigation Measure 4.1.6)	Y	A pre-maintenance meeting will be scheduled in coordination with the MMC prior to initiating project activities. A biological monitor will be required and included in the pre-maintenance meeting. See response to No. 2 for more information.
45	Does the IMP include appropriate maintenance designs? (Mitigation Measure 4.1.7)	Y	Notes under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 include the design measures specified by Mitigation Measure 4.1.7. Notes 8 through 17 under MMP Protocol Requirements will control trash, provide proper removal and disposal of hazardous waste, and ensure proper installation, inspection, and maintenance of sediment and erosion control BMPs. In addition, MMP Protocol Requirement BIO-4 and Note 2 of the Additional Maintenance Requirements section of the IMP contains provisions to preclude introduction of invasive plants. The IMP also defines specific maintenance access and staging to disturbed areas and MMP Protocol Requirement BIO-1 restricts access to these specific areas.
46	Has the ADD Environmental Designee verified that the MHPA boundaries and the requirements regarding coastal California gnatcatcher been included in the IMP and/or IBA? (Mitigation Measure 4.1.8)	Y	Although the maintenance would not occur within the MHPA, the IBA indicates that the gnatcatcher could be directly impacted if the species is utilizing the site or staging areas and vegetation is removed during the breeding season. Thus, impacts to the gnatcatcher could occur if maintenance is conducted within the bird's breeding season (March 1-August 15). The IBA included a restriction on clearing of coastal sage scrub habitat during the coastal California gnatcatcher breeding season to avoid direct impacts on that species. The IMP included MMP Protocol Requirement BIO-3 on Sheet 4, which requires a pre-maintenance meeting on site prior to the start of channel maintenance and the biologist will review the specific measures to protect sensitive biological resources, which will include the restriction on clearing of coastal sage scrub habitat. No noise control/monitoring for coastal California gnatcatchers would be required in accordance with the conclusions in the INA.

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Master Program Protocols			
Water Quality			
47	Does the IMP include measures to stabilize designated access roads (or other graded areas) with permeable protective surfacing (e.g., grasscrete), storm water diversion structures (e.g., brow ditches or berms), or crossing structures (e.g., culverts) to control erosion and prevent off-site sediment transport? (WQ-1)	NA	Access roads and staging areas do not need to be stabilized as all roadways used for these activities are paved. Notes 12, 13, 14, and 17 of MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 describes measures to prevent off-site sediment transport, such as berms.
48	Does the IMP include measures to prevent off-site sediment transport during maintenance through the use erosion and sediment controls within storm water facilities, along access routes and around stockpile/staging areas? Will temporary erosion or sediment control measures be removed upon completion of maintenance unless their removal would result in greater environmental impact than leaving them in place? (WQ-2)	Y	Erosion and sediment controls such as street sweeping and vacuuming, and sandbag barriers will be implemented to prevent off-site sediment transport during maintenance. See Appendix A (IMP), Sheet 4 of the IMP for Map 101 and Appendix G (WPCP) for more information.
49	Does the IMP require storage of BMP materials on-site in a way that provides complete protection of exposed areas and prevent off-site sediment transport? (WQ-3)	Y	Note 13 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 includes this requirement.
50	Does the IMP require training for personnel responsible for the proper installation, inspection, and maintenance of on-site BMPs. (WQ-4)	Y	Note 14 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 includes this requirement.
51	Does the IMP require revegetation of spoil and staging areas within 30 days of completion of maintenance activities? Does it require monitoring and maintenance of revegetated areas for a period of not less than 25 months following planting? (WQ-5)	Y	Note 17 under Maintenance BMPs on Sheet 3 of the IMP for Map 101 includes this requirement.
52	Does the IMP require sampling and analysis; monitoring and reporting; and post-maintenance management programs per National Pollutant Discharge Elimination System (NPDES) and/or City requirements? (WQ-6)	NA	The project is not subject to NPDES requirements because the NPDES General Construction Permit excludes projects that consist of “routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of the facility” activities (for more information, see Appendix G (WPCP), page 2). Note 13 under Maintenance BMPs on Sheet 3 of the IMP for Map 101 includes this requirement pursuant to City requirements.
53	Does the IMP prohibit storing hazardous materials used during maintenance within 50 feet from storm water facilities? Does it require hazardous materials to be managed and stored in accordance with applicable local, state and federal regulations? (WQ-7)	Y	Note 15 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 includes this requirement.
54	Does the IMP prohibit storage of maintenance-related trash in areas within 50 feet from storm water facilities, and require removal of trash in receptacles at least weekly? (WQ-8)	Y	Note 16 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 includes this requirement.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
Master Program Protocols (cont.)			
Water Quality (cont.)			
55	Does the IMP require installation of any check dam or other comparable mechanism identified in the corresponding IHHA? Are these structures required to be removed when vegetation growth has reached a point where the structure is no longer required unless removal would result in greater environmental harm than leaving them in place? (WQ-9)	N	The IHHA (Appendix D) determined that no check dam was necessary for Map 101.
56	Does the IMP require inspection of earthen-bottom storm water facilities within 30 days of the first 2-year storm following maintenance? Are erosion control measures recommended by the field engineer incorporated into the IMP? (WQ-10)	Y	Note 17 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 includes this requirement.
57	Does the IMP incorporate mitigation measures identified in the IWQA and/or Table 4.8-8 of the PEIR?	Y	Maintenance BMPs are identified on Sheet 3 of the IMP. In addition, the City will continue to implement general water quality improvement activities, as required. The City will utilize a suite of pollution prevention, source control, and treatment BMPs to address sediment and other pollutant inputs.
Biological Resource Protection			
58	Does the IMP restrict vehicles to access designated in the Master Program? (BIO-1)	Y	Note 1 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 includes this requirement.
59	Does the IMP require delineation and flagging of all sensitive biological resources to remain within or adjacent to the maintenance area? (BIO-2)	Y	Note 2 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 includes this requirement.
60	Does the IMP require a pre-maintenance meeting when maintenance will occur within or adjacent to sensitive biological resources? (BIO-3)	Y	Note 3 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 includes this requirement.
61	Are erosion control measures designed to avoid introduction of invasive plant species? (BIO-4)	Y	Note 4 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 includes this requirement.
62	Does the IMP require conducting pre-Master Maintenance Protocol surveys if maintenance is proposed during the breeding season of a sensitive animal species? (BIO-5)	Y	Note 5 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 includes this requirement.
63	If arundo will be removed during maintenance, does the IMP include appropriate removal methods to minimize downstream dispersal? (BIO-6)	Y	Note 6 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 includes this requirement.
64	Does the IMP prohibit the use of mechanized maintenance within 300 feet of a Cooper's hawk nest, 900 feet of a northern harrier's nest, or 500 feet of any other raptor's nest until any fledglings have left the nest? (BIO-7)	Y	Note 7 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 includes this requirement.

SUBSTANTIAL CONFORMANCE REVIEW CHECKLIST MASTER STORM WATER SYSTEM MAINTENANCE PROGRAM

No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
Master Program Protocols (cont.)			
Biological Resource Protection (cont.)			
65	Does the IMP include measures to minimize the potential for entrapping wildlife when implementing erosion control measures? (BIO-8)	NA	No erosion control measures are associated with the maintenance that would pose a substantial risk of entrapping wildlife.
Historical Resource Protection			
66	Does the IMP call for flagging, capping, or fencing of all historical resource areas in the field prior to initiation of maintenance activities in the presence of a qualified historical resource specialist, as necessary)? (HIST-1)	NA	No flagging, capping or fencing of historical resources is required because no known cultural resources occur in the maintenance area.
67	Does the IMP require a pre-maintenance meeting on-site when maintenance activities are determined in the IHA to potentially impact historic resources? (HIST-2)	NA	As no significant historical resources were identified in the IHA, the IMP does not require a pre-maintenance meeting with a monitoring archaeologist.
Waste Management			
68	Does the IMP call for disposal of compostable green waste material at an approved composting facility, if available? (WM-1)	Y	Note 8 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 meets this requirement.
69	Does the IMP call for screening of soil, sand, and silt to remove waste debris and, wherever possible, to be re-used as fill material, aggregate, or other raw material? (WM-2)	Y	Note 9 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 meets this requirement.
70	Does the IMP call for separation and transport of waste tires to an appropriate disposal facility, including the completion of a Comprehensive Trip Log (CTL) if more than nine tires are in a vehicle or waste bin at any one time? (WM-3)	Y	Note 10 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 meets this requirement.
71	Does the IMP require hazardous materials encountered during maintenance to be logged under a hazardous materials manifest and transported to an approved hazardous waste storage, recycling, treatment or disposal facility? (WM-4)	Y	Note 11 under MMP Protocol Requirements on Sheet 4 of the IMP for Map 101 meets this requirement.